

**WEST COAST GROCERY COMPANY**

1525 EAST "D" ST. / P.O. BOX 2237 / TACOMA, WASHINGTON 98401 / (206)593-3200

June 22, 1989

Mr. Michael Stoner  
U. S. Environmental Protection Agency  
Region 10  
Superfund Branch  
1200 - 6th Avenue, HW-113  
Seattle, WA 98101

Re: HW-113 Commencement Bay/Nearshore Tideflats  
Superfund Site

Dear Mr. Stoner:

The following is the response of Super Valu Stores, Inc. d/b/a West Coast Grocery Company to your letter of April 24, 1989 with regard to the above-referenced matter. The responses correspond to the numbered questions in your letter.

1. Attachment 1 contains a list of addresses for various buildings and property owned by Super Valu Stores Inc., that are contained in the CB/NT site. The chart also indicates the date of purchase and the prior owner. We are also enclosing a map that identifies the same properties.

Super Valu is also leasing 45,231 square feet at 1203 East "D" Street from The Wattles Company, P.O. Box 1233, Tacoma, Washington (98401). The lease is for two years commencing June 1, 1988 and ending July 1990. This property is used for dry storage of non-food and food items.

About ten years ago, West Coast Grocery leased property located at 2608 Port of Tacoma Road from the Port of Tacoma. The lease was for approximately 40,000 square feet and was for a term of approximately 24 months. It was used only for dry storage purposes.

At various times, West Coast Grocery has leased space for contingency training purposes. One of those spaces was located at 1160 Thorne Road from Brown & Haley.

**USEPA SF****1311178**

CB/NT

8.7.7.26.2-0002

Michael Stoner  
June 22, 1989  
Page 2

West Coast Grocery does not know of any hazardous materials that were used on that site. It also rented for approximately three months, space from Nichols Trucking, but this was used for office purposes only with respect to contingent hiring plans.

2. Super Valu Stores, Inc. is a Minnesota Corporation. In 1985 it acquired all of the stock of West Coast Grocery Company, a Washington corporation, and in 1989, all of the assets of that corporation were transferred to Super Valu Stores Inc. West Coast Grocery Company is no longer a separate entity. In 1985, Super Valu acquired 49% of the stock of West Coast Fruit & Produce Company. In 1987 it acquired the remaining 51% of that company. In 1989, all of the assets of that corporation were transferred to Super Valu. Hence, West Coast Fruit & Produce is no longer a separate entity.

Prior to its merger into Super Valu Stores, Inc., West Coast Grocery Company was incorporated in 1891 with its primary business being that of a wholesale grocer. It had been doing business in the CB/NT area from the dates indicated on Attachment 1. West Coast Fruit & Produce Company was formed in 1907 and its primary business was the distribution of fruit and produce to grocery stores. Super Valu has one other subsidiary that does business in the CB/NT site area. This subsidiary is Cigarette Distributions, Inc., which is in the business of wholesale distribution of cigarette products. Its management offices and warehouse facilities are located at 1801 East "D" Street.

The officers of Super Valu Stores, Inc. are at the home office located in Minneapolis, Minnesota, and none of its board of directors are residents of the State of Washington, nor do they do business in the State of Washington. A copy of a February 17, 1989 list of the officers and directors of Super Valu is enclosed.

3. The tax parcels do not appear to be correct. Many of the parcels owned by Super Valu have now been consolidated under tax parcel No. 895000-165-1. Super Valu has not determined which of the parcel numbers attached have been consolidated into the above-referenced parcel

Michael Stoner  
June 22, 1989  
Page 3

number. It believes Parcel Nos. 895000-1660, 1640, 1670, 1650, 1691, 1690, 1713 and 1700 have been combined into the above parcel number. The other parcel numbers, 637000-0085, 0010, 0020, and 0051, appear to be correct. The parcel number for the property upon which West Coast Fruit & Produce does business is 6370000030.

4. See answer to number 1 above. Super Valu does lease space at 1801 East "D" Street to Telco Credit Union and to Cigarette Distributions, Inc.
5. Attachment 2 lists the addresses of the properties owned by Super Valu Stores, Inc. in the CB/NT area and identifies the nature of the business operated on those properties. The location and use of leased space is identified in paragraph 1, above.
6. Super Valu receives, stores and then sells many products for which it receives MSDS forms. These are too voluminous to enclose and Super Valu knows of no major spills or accidents with those products.

Super Valu also receives MSDS forms for products it uses for warehouse maintenance. It is enclosing the MSDS forms for those products. In summary, the products are used for patching the floor, cleaning the floor (there, the material is vacuumed and put into the sanitary sewer system), patching walls, ammonia for the refrigeration system, nitrogen contained in the fire protection system, a blueshield gas used in welding, paraffin blocks used for rodent bait, batteries (which are traded in; they are not disposed of or repaired on the property) and wood dust (pallet repair).

Super Valu also receives MSDS forms for various office supplies. If a list of these supplies is in fact needed, please advise the undersigned.

Super Valu has also received numerous MSDS forms with regard to its trucking facilities. These MSDS forms are contained in notebooks that are maintained at the truck shop. If you are in need of reviewing any of the

Michael Stoner  
June 22, 1989  
Page 4

notebooks, please contact the undersigned to arrange a time to review those books containing the MSDS forms.

The truck shop currently has an oil sump for collection of residue oils from trucks and other machinery. Super Valu is in the process of replacing this sump pump with an oil/water filter separator.

The trucking department uses cleaning compounds that are used for steam cleaning and degreasing. The MSDS sheets on these are enclosed. Super Valu is in the process of designing and installing an oil/water filter/separator for this operation.

The trucking department also collects used oil in a 250 gallon oil container. This oil container is maintained by Dave Drexler, RamCor Oil Company, P.O. Box 7485, Tacoma, Washington. They remove the used oil. Super Valu understands that RamCor Oil Company is a Company authorized by the EPA to dispose of such waste oil.

Super Valu also uses specialized cleaning agents for cleaning truck parts. These are used in special tanks. Those tanks are maintained by Safety Kleen Corp. 3210 "C" Street N.E., Auburn, Washington, which removes the cleaning agent periodically and cleans the tank. Super Valu understands that Safety Kleen Corp. is also an approved EPA contractor.

Super Valu also has a print shop. In that print shop, it handles various products for which it receives MSDS forms. These MSDS forms are collected in a notebook which is available for review upon request. Super Valu does not believe any of those other products are disposed of into the City storm drain or otherwise dumped into the City waterway. Super Valu does use three (3) solvents in the print shop, the MSDS forms for which are enclosed. Once used, these solvents are collected in a container and then delivered to the truck shop. They are then removed by Aero Services, 4110 East 11th Street, Tacoma, Washington. Super Valu understands that Aero Services is an EPA approved contractor. Any solid waste with respect to the print shop are disposed of by delivery to the landfill.

Michael Stoner  
June 22, 1989  
Page 5

The print shop also uses fixer and developer. The MSDS for those are enclosed. The silver located in these solutions is first removed through a special machine designed for that purpose. Then the two mixtures are mixed together (which neutralizes each other), and are then deposited in the sanitary sewer as suggested by the MSDS form.

7. See answer to No. 6. Without extensive time, Super Valu is unable to estimate the quantities of the products identified above.
8. See answer to No. 6. Super Valu believes it is unduly cumbersome for it to determine how long each of the possible contaminants have been stored and when they were disposed of except to the extent indicated in the answer to No. 6, above.
9. See answer to No. 6.
10. See answer to No. 6. Super Valu does not believe it is mixing hazardous substances with oil or petroleum products.
11. Approximately three months ago, there was an ammonia leak because of a broken refrigerator line. It is estimated that perhaps 20 pounds of ammonia was released into the atmosphere. This was promptly fixed.

In approximately 1978, while constructing the current office building at 1525 East "D" Street, the contractor broke into an abandoned Bunker C fuel line. This line was virtually empty, then capped and covered. The building was then built over that pipeline.

Prior to 1984, the meat department experienced one overflow of the grease trap. This spill was immediately cleaned up.

Super Valu has a number of underground fuel storage tanks on its property. The ground around the tanks has recently been inspected. A copy of the inspection report is enclosed (that report indicates it is the second phase report, but it in fact is the only report;

it supersedes earlier reports that were inaccurate and incomplete). The tanks were tested in 1985 and 1987, which tests indicated they were tight. Super Valu is in the process of implementing a plan to either remove such storage tanks and any contaminated ground or to install appropriate leak detection and prevention devices in those tanks that are still sound. All of this action will be taken in compliance with applicable governmental requirements.

12. Super Valu has made an environmental investigation with regard to its fuel tanks. A copy of that investigation is enclosed. The City of Tacoma has made an investigation of Super Valu's truck shop. A copy of the report from the City of Tacoma is enclosed. An analysis of the proposed oil/water filter/separator at the truck shop has been made. A copy of the Pac-Tech engineer's letter on that subject is enclosed.
13. Attachment 3 is a map showing the general configuration of the Super Valu buildings. Also enclosed are two pictures. Attachment 4 was taken in approximately 1976 and Attachment 5 was taken in approximately 1985. None of the property abuts the shoreline. Super Valu has drawings with respect to the construction of the various buildings located on these properties and has other pictures of these and prior buildings on the property. These pictures and drawings are voluminous and are not being enclosed.
14. Super Valu is enclosing drawings with regard to underground storage facilities and other underground structures. Also enclosed is a copy of a Tacoma-Pierce County Health Department picture which shows storm drainage.
15. Virtually all of the property is either enclosed or is paved. The only exception is a sand trailer parking facility at 475 East 19th Street. Surface water from the paved area runs into the storm sewer, which connects to the City storm drainage system. See the Tacoma-Pierce County Health Department picture which is enclosed for the location of the storm drainage system on the property. One oil/water storm drain has been

Michael Stoner  
June 22, 1989  
Page 7

installed in the grocery warehouse driveway. Construction drawings are voluminous and not readily available. If they are needed, contact the undersigned.

16. Super Valu does not believe it has any liability insurance with regard to releases of hazardous substances and/or waste pollutants except for a policy issued by Liberty Mutual with regard to the underground storage tanks. The current policy is in the amount of \$110,000,000.

17. The current brokerage company which delivers fuel oil to Super Valu is: Unocal, 3131 Elliott Avenue, Seattle, Washington. It hires other companies to deliver such fuel oil. Super Valu has used this broker as its primary broker for the last six years or longer. Prior to that time, Super Valu used other large brokers.

The companies that deliver the various products identified by the MSDS forms are too voluminous to list or even identify at this time. If there are particular products for which you wish to know who delivers or removes those products, please identify them and Super Valu will respond to the request.

18. See above. If any other records or information is needed, please identify them so that the question can be answered more completely.
19. See answers to the proceeding questions. The following persons within Super Valu may have knowledge with regard to the above questions:

Herb Muchow (Facilities Manager)  
Pete Clarke (Warehouse and Transportation  
Superintendent, Tacoma Division)  
Herb Engdahl (General Manager and previously  
Operations Vice-President)  
Nelson Morey (Facilities Manager (b) (6)  
prior to Herb Muchow)  
Mike Swanson (Vehicle Maintenance Manager)  
Carl Zetterberg (Prior Vehicle Maintenance  
Manager (b) (6))

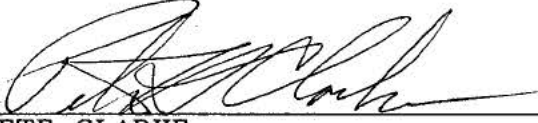
Michael Stoner  
June 22, 1989  
Page 8

Gene Garrity (Prior Meat Department Vice  
President (b) (6))  
Don Kitts (Previous Transportation and  
Truck Shop Manager (b) (6))  
Dave Gohen (Print Shop Manager)  
Gordon Dowling (West Coast Fruit and  
Produce Operations)

Sincerely,

SUPER VALU STORES, INC.

By:

  
PETE CLARKE

Warehouse and Transportation  
Manager, Tacoma Division

By:

  
HERB MUCHOW

Facilities Manager